

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

ESTATE OF ELEANOR NORTINGTON,)

Plaintiff,)

v.)

CITY OF INDIANAPOLIS, LANE COOPER,)

ROBERT HALEY, JR., JUSTIN HYDE,)

BRUCE JACKSON, AND)

RONALD MONDAY,)

Defendants.)

Case No. 1:21-cv-406-TWP-TAB

AFFIDAVIT OF BRUCE JACKSON

I, Bruce Jackson, being duly sworn and under oath, testifies that:

1. I am over the age of eighteen.
2. I am competent to testify about the facts in this affidavit, and it is based on my personal knowledge.
3. I am a patrol officer for the Indianapolis Metropolitan Police Department ("IMPD") and have been so employed since January 2004.
4. On February 6, 2019, I attended the church service, which began at 7:00PM, where Eleanor Northington had a mental crisis, disrupted the service, and physically assaulted both parishioners and police officers alike.
5. I was not working that day, but all actions were taken in my capacity as a law enforcement officer, and were done to further the interests of my employer – the City of Indianapolis. The City and IMPD both have a substantial interest

and the document reflects that I called 911 at 8:26PM.

13. Ms. Northington had been very physically active from the time the church service began throughout the time that we detained her in handcuffs, and continued until she had breathing difficulties.

14. I was not charged with any criminal offense for my February 6, 2019 conduct.

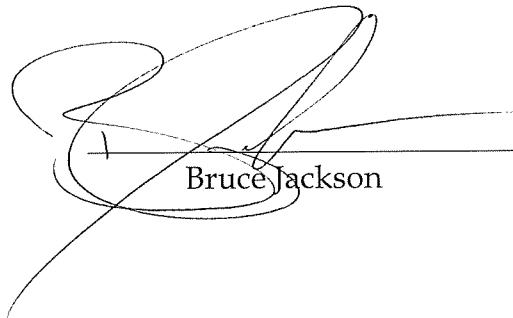
15. An internal affairs ("IA") investigation conducted by IMPD also concluded that I did not violate any of IMPD's rules, regulations, or general orders.

FURTHER AFFIANT SAYETH NAUGHT.

AFFIRMATION

I hereby affirm under the penalties of perjury that the foregoing representations are true to the best of my knowledge and belief.

March 30, 2022
Dated


Bruce Jackson